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ECF

November 12, 2024

Hon. Nina R. Morrision  
Judge, United States District Judge  
For the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. *Chen Jinping et al*, 23 Cr. 316 (NRM)

Hon. Judge Morrison:

With consent of the government, and on behalf of both defendants I write to seek an adjournment of the November 18, 2024 status conference in the above matter. The parties are engaged in plea negotiations and hope to conclude those negotiations with a pretrial disposition. The parties are available on the afternoon of December 2, 2024 or December 3, 2024, should those dates be convenient to the Court.

Each defendant on this indictment agrees to the exclusion of time under the Speedy Trial Act. To that end, each defendant through their counsel agrees that the time between November 18, 2024, and next date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial, because it will allow the government and defense counsel to continue discussions regarding a possible disposition in the matter

Respectfully submitted,

/s/Susan Kellman & Sabrina Shroff  
Counsel for Chen Jinping

/s/John Carman  
Counsel for Lu Jianwang